

**UNITED STATES DISTRICT COURT  
IN THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

RED ROCK ANALYTICS, LLC,  
Plaintiff,

v.

APPLE INC., QUALCOMM INC.  
Defendants.

Case No. 6:21-CV-00346-ADA

**JURY TRIAL DEMANDED**

**DECLARATION OF SARAH GUSKE IN SUPPORT OF DEFENDANTS QUALCOMM  
INC. AND APPLE INC.'S MOTION TO TRANSFER VENUE TO THE NORTHERN  
DISTRICT OF CALIFORNIA**

I, Sarah Guske declare:

1. I am a partner at the law firm of Baker Botts, L.L.P., and counsel for the Defendant Qualcomm Incorporated (“Qualcomm”). I have personal knowledge of the facts stated herein and if called as a witness, could and would testify thereto.
2. Attached as **Exhibit 1** is, on information and belief, a true and correct copy of a 2021 Florida Limited Liability Company Annual Report filed with the Florida Secretary of State by Plaintiff Red Rock Analytics, LLC on March 30, 2021.
3. Attached as **Exhibit 2** is, on information and belief, a true and correct copy of Red Rock Analytics LLC’s Initial Disclosures in *Red Rock Analytics, LLC v. Apple Inc.*, No. 2:19-cv-117-JRG (E.D. Tex. 2019), filed as Exhibit 27 to Defendant Apple Inc’s Motion to Transfer Venue Under 28 U.S.C. § 1404(a) (D.I. 54-41) in No. 2:19-cv-117-JRG.
4. Attached as **Exhibit 3** is, on information and belief, a true and correct copy of the LinkedIn profiles for Mr. Rishi Mohindra and Mr. Tong Zhang, accessed on August 24, 2021.
5. Attached as **Exhibit 4** is a true and correct copy of available flights departing on October 1, 2021 from San Diego (SAN) to San Jose (SJC) and returning to San Diego (SAN) on the same day, accessed from Google Flights on August 20, 2021.
6. Attached as **Exhibit 5** is a true and correct copy of driving directions between the San Jose Airport (SJC) and the United States District Court in San Jose, California; driving directions between the Austin Airport (AUS) and the United States District Court in Waco, Texas; and driving directions between the Dallas-Fort Worth Airport (DFW) and the United States District Court in Waco, Texas, accessed from Google Maps on August 20, 2021.

7. Attached as **Exhibit 6** is a true and correct copy of available flights departing on October 1, 2021 from San Diego, California (SAN) to Austin, Texas (AUS) and returning to San Diego (SAN) on the same day, accessed from Google Flights on August 20, 2021.
8. Attached as **Exhibit 7** is a true and correct copy of available flights departing on October 1, 2021 from San Diego, California (SAN) to Dallas, Texas (DFW or DAL) and returning to San Diego (SAN) on the same day, accessed from Google Flights on August 20, 2021.
9. Attached as **Exhibit 8** is a true and correct copy of available flights departing on October 1, 2021 from San Jose, California (SJC) to Austin, Texas (AUS) and returning to San Jose (SJC) on the same day, accessed from Google Flights on August 20, 2021.
10. Attached as **Exhibit 9** is a true and correct copy of available flights departing on October 1, 2021 from San Jose, California (SJC) to Dallas, Texas (DFW or DAL) and returning to San Jose (SJC) on the same day, accessed from Google Flights on August 20, 2021.
11. Attached as **Exhibit 10** is, on information and belief, a true and correct copy of excerpts of the file history for U.S. Patent No. 7,346,313.
12. Attached as **Exhibit 11** is a true and correct copy of time to milestone statistics for WDTX and NDCA, generated by Docket Navigator™ for cases filed on or after January 1, 2016, accessed on August 20, 2021.
13. Attached as **Exhibit 12** is, on information and belief, a true and correct copy of excerpts of U.S. Patent Nos. 6,744,829, 7,035,341, 6,625,424, and 6,717,981.
14. Attached as **Exhibit 13** is a true and correct copy of the List of Qualcomm Accused Products named in an exhibit to Plaintiff's First Amended Complaint, referenced as Exhibit A in the Declaration of Anthony Simon in Support of Defendant Qualcomm Incorporated's Motion to Transfer Venue to the Northern District of California and the

Declaration of Rajiv Vijayan in Support of Defendant Qualcomm Incorporated's Motion  
to Transfer Venue to the Northern District of California.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 24<sup>th</sup> day of August, 2021 in Vail, Colorado.

/s/ Sarah Guske  
Sarah Guske